

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

MATTHEW HEARD, individually and on)	
behalf of all others similarly situated,)	
Plaintiff,)	
v.)	Case No. 4:18-cv-00559-DGK
)	
ENTERPRISE BANK & TRUST INC.,)	Hon. Judge Greg Kays
Defendant.)	
)	
)	

STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff Matthew Heard (“Plaintiff”) and Enterprise Bank & Trust (“Defendant”), by and through their respective attorneys, hereby stipulate to dismissal of this action with prejudice. In support of this Stipulation, the Parties state as follows:

1. On July 24, 2018, Plaintiff filed, on behalf of himself and all others similarly situated, this putative collective action pursuant to the Fair Labor Standards Act (“FLSA”), 29 U.S.C. §§201 *et seq.*, and putative class action pursuant to Rule 23 of the Federal Rules of Civil Procedure and the Missouri Minimum Wage Law (“MMWL”), Mo.Rev.Stat. § 290.500, *et seq.* (Doc. 1).
2. On October 25, 2018, Defendant filed an Answer to Plaintiff’s Complaint. (Doc. 15).
3. Attorneys for Defendant and Plaintiff have successfully resolved the disputed issues in the litigation on behalf of Defendant and Plaintiff, as well as opt-in Plaintiffs David Peterson and Michael Clark.

WHEREFORE, the Parties jointly ask the Court to dismiss this case with prejudice.

Dated: February 27, 2019

Respectfully Submitted,

/s/ James B. Zouras

James B. Zouras
Ryan F. Stephan
STEPHAN ZOURAS, LLP
100 N. Riverside Plaza, Suite 2150
Chicago, Illinois 60606
Telephone: (312) 233-1550
jzouras@stephanzouras.com
rstephan@stephanzouras.com

/s/ Jeffrey J. Carey

Jeffrey J. Carey
BOYD, KENTER, THOMAS & PARRISH,
LLC
229 SE Douglas Street, Suite 210
Lee's Summit, Missouri 64063
Telephone: (816) 246-9445
carey@carey-lawfirm.com

***Counsel for Plaintiff, the Putative FLSA
Collective and the Putative State-Law Class***

/s/ Josef S. Glynias

Josef S. Glynias, MO Bar #54974
HUSCH BLACKWELL, LLP
190 Carondelet Plaza, Suite 600
St. Louis, Missouri 63105
Telephone: (314) 345-6000
Joe.Glynias@huschblackwell.com

Julianne P. Story, MO Bar No. #42295
HUSCH BLACKWELL, LLP
4801 Main Street, Suite 1000
Kansas City, Missouri 64112
Telephone: (816) 983-8000
Julianne.Story@huschblackwell.com

Counsel for Enterprise Bank & Trust

CERTIFICATE OF SERVICE

The undersigned counsel for Plaintiff Matthew Heard hereby certifies that he caused a true copy of the foregoing document to be filed electronically on February 27, 2019. Notice of this filing will be sent to all parties registered on this Court's ECF system by operation of the Court's electronic filing system.

By: /s/ James B. Zouras